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Attorney for Defendant,
KENNETH GOULD

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH GOULD

Defendant.

Case No.: 1:21-cr-00243 JLT-SKO

STIPULATION TO PERMIT TRAVEL
TO LAS VEGAS, NEVADA, AND
WEST LINN, OREGON; ORDER

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Marc Days, counsel for defendant Kenneth Gould, that the Court may enter an order permitting Mr. Gould to travel to Las Vegas, Nevada, between October 30, 2024, and November 2, 2024, and West Linn, Oregon, between December 22, 2024, and December 28, 2024.

Mr. Gould's conditions of release restrict his travel to the Central District of California, where he resides, and the Eastern District of California. See ECF #12. Mr. Gould would like to visit one of his daughters and grandchildren, who live in Las Vegas, Nevada. If approved, Mr. Gould would leave his residence on October 30, 2024, and return on November 2, 2024.

Mr. Gould would also like to visit his oldest daughter and grandchildren, who live West Linn, Oregon. If approved, Mr. Gould would leave his residence on December 22, 2024, and return on December 28, 2024. Mr. Gould is not supervised by Pretrial Services; accordingly, defense counsel did not obtain Pretrial Services' position on this request.

Respectfully submitted,

Dated: October 11, 2024

/s/ Marc Days

MARC DAYS

Attorney for Dennis Falaschi

Dated: October 11, 2024

/s/ Joseph Barton

JOSEPH BARTON

Assistant United States Attorney

ORDER

Upon the parties' stipulation and for good cause shown, the Court hereby authorizes Mr. Gould to travel to Las Vegas, Nevada, between October 30, 2024, and November 2, 2024, and to West Linn, Oregon, between December 22, 2024, and December 28, 2024.

IT IS SO ORDERED.

Dated: **October 11, 2024**

/s/ Eric P. Gray

UNITED STATES MAGISTRATE JUDGE